

**IN THE UNITED STATES COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
CIVIL ACTION – LAW**

SIMONA OCKLEY	)	
	)	
vs.	)	<b>CIV. NO.: 2:24-cv-04070</b>
	)	
TOWNSHIP OF RADNOR, ET AL.	)	
	)	
Defendants.	)	
	)	

**PLAINTIFF’S RESPONSE TO DEFENDANTS, ROCKWELL-GLYNN, JEFFREY  
BRYDZINSKI AND TYLER PRETE’S, AFFIRMATIVE DEFENSES**

Plaintiff, Simona Ockley, by and through her undersigned counsel submit the following responses to Defendants’ Affirmative Defenses and aver as follows:

1. No response required.
2. - 5. Denied as conclusions of law.
6. Denied as a conclusion of law. By way of further answer, Answering Defendants have failed to plead any facts supporting their claim that Plaintiff is engaged in a pending state law claim.
7. – 11. Denied as conclusions of law.
12. Denied as a conclusion of law. By way of further answer, Answering Defendants have failed to plead any facts supporting their claim that Defendants did not supervise, control, train, or otherwise cause the other Defendants to act or fail to act in any manner.
13. Denied as a conclusion of law.
14. Denied as a conclusion of law. By way of further answer, Answering Defendants have failed to plead any facts supporting their claim that Defendants acted reasonably within existing Court orders.

15. – 18. Denied as conclusions of law.

WHEREFORE, Plaintiff demands judgment against defendants Rockwell Glynn, Jeffrey Brydzinski, and Tyler Prete for actual damages, court costs, and attorney's fees and such other relief deemed to be just and equitable.

LAW OFFICE OF NEIL E. BOTEL

A handwritten signature in dark ink, appearing to read "Neil Botel", written in a cursive style.

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